

TRINA A. HIGGINS, United States Attorney (#7349)  
ALLISON H. BEHRENS, Assistant United States Attorney (#38482MO)  
Attorneys for the United States of America  
111 South Main Street, Suite 1800  
Salt Lake City, Utah 84111  
Telephone: (801) 524-5682

FILED US District Court-UT  
NOV 13 '24 PM02:16

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

	<u>INDICTMENT</u>
UNITED STATES OF AMERICA,  Plaintiff,  vs.  CHRISTOPHER MANDARINO,  Defendant.	<b>VIOLATIONS:</b>  Count 1: 18 U.S.C. § 922(g)(1), Felon in Possession of a Firearm and Ammunition;  Count 2: 18 U.S.C. § 844(f)(1), Use of Fire to Damage Property Possessed by a Federally Funded Institution;  Count 3: 18 U.S.C. § 1366(b) – Destruction of an Energy Facility;  Count 4: 18 U.S.C. § 844(h)(1) – Use of Fire to Commit a Federal Felony.  Case: 2:24-cr-00372 Assigned To : Nielson, Howard C., Jr Assign. Date : 11/12/2024

The Grand Jury charges:

**COUNT 1**  
**18 U.S.C. § 922(g)(1)**  
(Felon in Possession of a Firearm and Ammunition)

On or about October 28, 2024, in the District of Utah,

CHRISTOPHER MANDARINO,

the defendant herein, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: a Walther P22 .22-caliber pistol and ammunition, and the firearm and ammunition were in and affecting commerce; all in violation of 18 U.S.C. § 922(g)(1).

**COUNT 2**  
**18 U.S.C. § 844(f)(1)**

(Use of Fire to Damage Property Possessed by a Federally Funded Institution)

On or about October 28, 2024, in the District of Utah,

CHRISTOPHER MANDARINO,

the defendant herein, maliciously damaged personal and real property by means of fire, said personal and real property being possessed in whole and in part by an institution receiving Federal financial assistance; all in violation of 18 U.S.C. § 844(f).

**COUNT 3**  
**18 U.S.C. § 1366(b)**

(Destruction of an Energy Facility)

On or about October 28, 2024, in the District of Utah,

CHRISTOPHER MANDARINO,

the defendant herein, knowing and willfully damaged the property of an energy facility in an amount that exceeds \$5,000; all in violation of 18 U.S.C. § 1366(b).

**COUNT 4**  
**18 U.S.C. § 844(h)(1)**  
(Use of Fire to Damage Property of Energy Facility)

On or about October 28, 2024, in the District of Utah,

CHRISTOPHER MANDARINO,

the defendant herein, knowingly used fire to commit the crime of Destruction of an Energy Facility, as charged above in Count 3, a felony prosecutable in a court of the United States; all in violation of 18 U.S.C. § 844(h).

**NOTICE OF INTENT TO SEEK FORFEITURE**

Pursuant to 18 U.S.C. § 924(d)(1), upon conviction of any offense violating 18 U.S.C. § 922, the defendant shall forfeit to the United States of America any firearm or ammunition involved in or used in the commission of the offense, including, but not limited to:

- A Walther P22, .22 caliber pistol
- Ammunition

A TRUE BILL:

  
\_\_\_\_\_  
FOREPERSON OF THE GRAND JURY

TRINA A. HIGGINS  
United States Attorney

  
\_\_\_\_\_  
ALLISON H. BERRENS  
Assistant U.S. Attorney